

EXHIBIT G

1 ALTO LITIGATION, PC
2 Ellen London (Bar No. 325580)
ellen@altolit.com
3 Bess Ibtisam Hanish (Bar No. 325938)
bess@altolit.com
4 4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 779-2586
5 Facsimile: (415) 306-8744

6 THE STOUT FIRM, P.C.
7 Thomas D. Stout (Bar No. 241348)
tstout@stoutfirm.com
8 317 Washington Street, Suite 170
Oakland, CA 94607
Telephone: (415) 862-8485
9 Facsimile: (415) 862-8487

10 Attorneys for Interested Party
CN UTILITY CONSULTING, INC.
11

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 UNITED STATES OF AMERICA,

No. CR 14-00175-WHA

16 Plaintiff,

**DECLARATION OF [REDACTED]
[REDACTED] IN RESPONSE TO THE
COURT'S FEBRUARY 18, 2021
ORDER**

17 v.
18 PACIFIC GAS AND ELECTRIC
COMPANY,

19 Defendant.
20

21 I, [REDACTED], declare as follows:

22 1. I am currently employed by CN Utility Consulting (“CNUC” or the “Company”).

23 2. My position at CNUC is Consulting Utility Forester (“CUF”) III. As described in
my declaration submitted on February 12, 2021 in this matter, Docket No. 1300-2, I started at
24 CNUC as a CUF I, and was promoted to the position of CUF III in October of 2019.

25 3. I have reviewed the Court’s order in this matter, dated February 18, 2021, Docket
26 No. 1297.

27 4. I submit this declaration in response to the Court’s February 18, 2021 Order.
28

1 5. Attached hereto as Exhibit A is a copy of the image to which I was referring in
2 paragraph 22 of my declaration filed on February 12, 2021. The area in which I indicated that a
3 tree appeared to have a black base from being burned is circled in red. While it appears to me that
4 the discoloration I see in that area of the image is a burn mark, it is possible the discoloration in
5 the image is the result of the angle of the sunlight in the image and the shadows from the tree,
6 surrounding trees, and other brush.

7 6. To clarify my February 12, 2021 declaration, page 11 of the Court's order dated
8 December 29, 2020, Docket No. 1277 contains an arrow pointing to two trees in close proximity
9 to each other, and in discussing the discoloration, I was referring to the tree next to the Gray Pine.

10 7. Based solely on my review of this image, and as I discussed with regard to the Gray
11 Pine, the tree on which I believe there may be burn marks appears to me to be healthy and green.
12 Both trees appear in this image to be in compliance with vegetation management standards.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct.

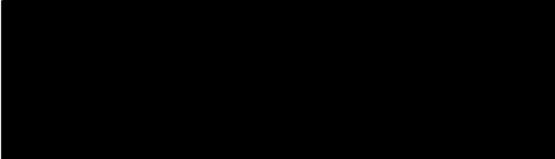
15 DATED: March 2, 2021
16 
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

